

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SHANE STEELE,

Plaintiff,

v.

NORFOLK SOUTHERN RAILWAY
COMPANY,

Defendant.

Case No. 2:18-cv-13946-GCS-EAS

District Judge George Caram Steeh

Magistrate Judge Elizabeth A.
Stafford

**DEFENDANT’S UNOPPOSED MOTION TO WITHDRAW THE
APPEARANCES OF PAUL A. TESTA AND JOSEPH J. MCDONNELL**

Defendant NORFOLK SOUTHERN RAILWAY COMPANY, by its attorneys and pursuant to Local Rules 7.1 and 83.25, hereby moves to withdraw the appearances of Paul A. Testa and Joseph J. McDonnell as counsel for Defendant. In support of its motion, Defendant states the following:

1. Defendant has been represented in this action by counsel from Seyfarth Shaw LLP (“Seyfarth”) and Gallagher Sharp (“Gallagher”). Specifically, Seyfarth attorneys Erin Dougherty Foley, Kathryn S. Clark, and Paul A. Testa and Gallagher attorney Joseph J. McDonnell have appeared on Defendant’s behalf in this action.
2. Mr. Testa is no longer employed by Seyfarth.
3. In addition, Mr. McDonnell passed away recently.

4. Accordingly, Defendant requests to withdraw Mr. Testa's and Mr. McDonnell's appearances.

5. Several Seyfarth attorneys are fully admitted to the United States District Court for the Eastern District of Michigan, including Ms. Foley and Ms. Clark, and Seyfarth will continue to represent Defendant in this matter.

6. Before filing this motion, Ms. Clark conferred with Plaintiff's counsel, Gregory Paul, regarding the substance of this motion, and Plaintiff does not oppose Defendant's request to withdraw Mr. Testa's and Mr. McDonnell's appearances.

WHEREFORE, for the reasons stated herein, Defendant Norfolk Southern Railway Company respectfully requests that the Court grant its motion and issue an Order withdrawing Mr. Testa's and Mr. McDonnell's appearances.

Dated: December 17, 2020

Respectfully submitted,

NORFOLK SOUTHERN
RAILWAY COMPANY

By: /s/ Kathryn S. Clark
One of Its Attorneys

Erin Dougherty Foley (IL 6269761)
edfoley@seyfarth.com
Kathryn S. Clark (IL 6289232)
kclark@seyfarth.com
SEYFARTH SHAW LLP
233 South Wacker Drive, Suite 8000
Chicago, Illinois 60606-6448
Telephone: (312) 460-5000

Facsimile: (312) 460-7000

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that she caused a true and correct copy of the foregoing DEFENDANT’S UNOPPOSED MOTION TO WITHDRAW THE APPEARANCES OF PAUL A. TESTA AND JOSEPH J. MCDONNELL to be served upon the following via the Court’s electronic case filing system on this 17th day of December 2020:

Gregory G. Paul
Morgan & Paul, PLLC
100 First Ave.
Suite 1010
Pittsburgh, PA 15222
Email: gregpaul@morgan-paul.com

Paul A. Testa
Berchem Moses PC
75 Broad Street
Milford, CT 06460
Email: ptesta@berchemmoses.com

/s/ Kathryn S. Clark

Kathryn S. Clark